

KMIEC LAW OFFICES

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MILWAUKEE, WISCONSIN 53215-1007

CITY OF MILWAUKEE

ATTORNEYS AND COUNSELORS
MARJAN R. KMIEC
STEVEN G. KMIEC
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2002 MAY 28 PM 3:26 TELEPHONE
(414) 649-9790

RONALD D. LEONHARDT FACSIMILE
CITY CLERK (414) 649-9794

May 23, 2002

Ron Leonhardt
City Clerk of Milwaukee
205 City Hall
200 East Wells Street
Milwaukee, Wisconsin 53202-3551

James Purko, Director
Department of Public Works
City of Milwaukee
841 North Broadway Rm. 516
Milwaukee, Wisconsin 53202

Re: Our Client: Lorinda Avila
Date of Inj: 05/18/02

Dear Messieurs Leonhardt and Purko:

Enclosed you will find a Notice of Claim for injuries
sustained by our client.

Very truly yours,

KMIEC LAW OFFICES



Steven G. Kmiec

SGK/wpd
Enclosure

CITY OF MILWAUKEE
RECEIVED
02 MAY 28 PM 3:43
CITY ATTORNEY

MUNICIPAL NOTICE OF CLAIM/NOTICE OF INJURY

TO: Ron Leonhardt
City Clerk of Milwaukee
205 City Hall
200 East Wells Street
Milwaukee, Wisconsin 53202-3551

James Purko
Director of Department of Public Works
City of Milwaukee
841 North Broadway Rm. 516
Milwaukee, Wisconsin 53202

NAME AND ADDRESS OF CLAIMANT

Lorinda Avila
434 West Harrison Avenue
Milwaukee, Wisconsin 53207

CIRCUMSTANCES OF THE CLAIM

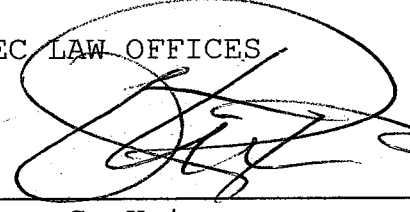
On May 18, 2002, the Claimant tripped over a water main shut off valve pipe which was not appropriately screwed down at the address of the Claimant. On the same date, the Claimant contacted the Department of Public Works and they screwed down the cap so that it was flush with the ground.

When the Claimant tripped, she fell on all fours causing damage to her knees as well as radiating numbness in her right arm, palm of her hand and pinky.

ITEMIZATION OF RELIEF SOUGHT

Potential medical expenses: \$20,000.00
Pain and suffering: \$30,000.00

Dated this 24th day of May, 2002.

KMIEC LAW OFFICES
By: 

Steven G. Kmiec
Attorney for
State Bar #01019277

P.O. BOX:

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Milwaukee, Wisconsin 53215
(414) 649-9790